## LAW OFFICES OF FRED L. SEEMAN 32 BROADWAY, SUITE 1214 NEW YORK, NEW YORK 10004

FRED L. SEEMAN, ESQ. FRED@SEEMANLAW.COM
PETER M. KIRWIN, ESQ. PETER@SEEMANLAW.COM

ALEX TAVAREZ, OFFICE MANAGER

TEL: (212) 608-5000 FAX: (212) 385-8161 WWW.SEEMANLAW.COM

July 19, 2023

## Via ECF

Honorable Gregory H. Woods United States District Court Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007

Re: Zivkovic v. Valbella at the Park LLC

Case No.: 22-cv-7344 Our File: F11300

Dear Judge Woods:

Our firm represents Defendant, Valbella at the Park LLC ("VATP") and non-party Oak Grove Road LLC ("OGR"). In accordance with Your Honor's Order dated July 17, 2023, enclosed please find a Declaration, as contemplated by Local Rule 1.4, in support of our firm's application to withdraw as counsel for VATP and OGR. Additionally, we request that the Court treat our firm's Letter, dated July 14, 2023, as our Memorandum of Law in support of such application.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Fred L. Seeman

The Law Offices of Fred L. Seeman By: Fred L. Seeman, Esq. Attorneys for Defendant, Valbella at the Park LLC and non-party Oak Grove Road LLC 32 Broadway, Suite 1214 New York, New York 10004 Tel: (212) 608-5000

## Encl.

cc: All Counsel via electronic filing

cc: Valbella at the Park LLC, c/o Rosey Kalayjian, via e-mail cc: Valbella at the Park LLC, c/o Robert Daleo, via e-mail cc: Oak Grove Road LLC, c/o Rosey Kalayjian, via e-mail